

Exhibit O

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
ZACHARY ADAMSON,

Plaintiff,

v.

CITY OF BUFFALO, CITY OF BUFFALO,  
POLICE DEPARTMENT, JOSEPH COOK,  
MICHAEL KEANE and SHARON ACKER,

Defendants.

PLAINTIFF'S SECOND  
DOCUMENT DEMAND OF  
DEFENDANTS

Civil Docket No. 11-CV-0663A

YOU ARE HEREBY COMMANDED to deliver to the offices of Spadafora & Verrastro, LLP, 2 Symphony Circle, Buffalo, New York 14201, attorneys for Plaintiff, on or before August 9, 2012, the following documents:

**SCHEDULE OF DOCUMENTS FOR PRODUCTION Definitions and Instructions**

1. "Document" means any handwritten, typewritten, printed, recorded, or graphic matter however produced or reproduced, whether or not in possession, custody, or control of City of Buffalo Police Department and whether or not claimed to be privileged against discovery on any ground, including, but not limited to, reports, records, list, memoranda, correspondence, telegrams, schedules, computer disks, tapes, diskettes, computer memory, transcripts, photographs, sound recordings or films, and any copies of such documents upon which appear any initialing, notation or hand writing or any kind which does not appear on the original.

2. If any privilege is claimed as to any document, please state for each document its date, author, addressee(s), format (e.g. memo, letter, notes, etc.), the nature of the privilege claimed (e.g., attorney-client, work product), and the basis for the claiming of privilege as to each specific item of information.

## REQUESTED DOCUMENTS

1. Produce a copy of the entire police file relating to the incident which occurred at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
2. Produce a copy of any and all arrest reports of any and all individuals arrested or taken into custody by any member, agent, servant or employee of the City of Buffalo and/or City of Buffalo Police Department at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
3. Produce a copy of any and all police reports relating to the subject incident which occurred at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
4. Produce a copy of any statements of any witnesses, sworn or unsworn relating to the incident at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
5. Produce a copy of any other forms completed, not required, or required to be completed pursuant to applicable law or departmental regulations relating to the incident at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
6. Produce a copy of any reports of any detectives or supervising officers relating to subject incident at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
7. Produce a copy of any photographs, diagrams or other artist renderings of the individuals, things or area relating to the subject incident at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
8. Produce a copy of any and all police examinations, analysis', or tests on any physical evidence relating to the subject incident at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.
9. Produce a list of any and all physical evidence which was seized, viewed or photographed relating to the subject incident at 585 Elmwood Avenue, Buffalo, New York on April 1, 2010 at approximately 7:15 pm.

Dated: July 25, 2012  
Buffalo, New York

Respectfully submitted,

Joseph C. Todoro, Esq.  
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TO: Carmen J. Gentile, Esq.  
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